



U.S. Department of Justice

United States Attorney
District of Minnesota

600 United States Courthouse
300 South Fourth Street
Minneapolis, MN 55415

Telephone: (612) 664-5600
Fax: (612) 664-5787

July 29, 2021

VIA ECF

The Honorable John R. Tunheim
District Court Judge, United States District Court
300 South Fourth Street
Minneapolis, MN 55415

Re:

Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and Looker's Gentlemen's Club LLC, Civil No. 20-CV-2155 (JRT/LIB);
Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and Ashton Pankonin, Civil No. 21-CV-1426 (JRT/LIB);
Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and 101 BV LLC, Civil No. 21-CV-1537 (JRT/LIB);
Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and Davis Family MN LLC, Civil No. 21-CV-1538 (JRT/LIB);
Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and Building One Properties LLC, Civil No. 21-CV-1539 (JRT/LIB);
Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and Beam Properties LLC, Civil No. 21-CV-1540 (JRT/LIB);
Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and Lakeland Investments LLC, Civil No. 21-CV-1542 (JRT/LIB);
Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and PFG II LLC, Civil No. 21-CV-1543 (JRT/LIB);
Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and Skyline Square LLC, Civil No. 21-CV-1547 (JRT/LIB);
Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and SGRM Commercial Properties LLC, Civil No. 21-CV-1550 (JRT/LIB);
Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and Nicols Properties LLC, Civil No. 21-CV-1551 (JRT/LIB); and
Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and Malocclusion LLC, Civil No. 21-CV-1552 (JRT/LIB).

July 29, 2021
Page 2

Dear Chief Judge Tunheim:

This letter is filed with permission from chambers following Mr. Hansmeier's filing of 10 motions on July 26, 2021, in the following cases: *Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and 101 BV LLC*, Civil No. 21-CV-1537 (JRT/LIB); *Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and Davis Family MN LLC*, Civil No. 21-CV-1538 (JRT/LIB); *Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and Building One Properties LLC*, Civil No. 21-CV-1539 (JRT/LIB); *Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and Beam Properties LLC*, Civil No. 21-CV-1540 (JRT/LIB); *Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and Lakeland Investments LLC*, Civil No. 21-CV-1542 (JRT/LIB); *Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and PFG II LLC*, Civil No. 21-CV-1543 (JRT/LIB); *Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and Skyline Square LLC*, Civil No. 21-CV-1547 (JRT/LIB); *Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and SGRM Commercial Properties LLC*, Civil No. 21-CV-1550 (JRT/LIB); *Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and Nicols Properties LLC*, Civil No. 21-CV-1551 (JRT/LIB); and *Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and Malocclusion LLC*, Civil No. 21-CV-1552 (JRT/LIB).

First, this letter restates the Federal Defendants' request to respond on or before August 3, 2021, to Plaintiff Paul Hansmeier's Motion to Dismiss or Remand, Doc. 16, filed in the matter of *Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and Ashton Pankonin*, Civil No. 21-CV-1426 (JRT/LIB) on July 6, 2021. To the extent that motion raises the issue of remand in connection with the issue of subject-matter jurisdiction in that case, the Federal Defendants will discuss remand in their response thereto.

Second, this letter notes that Mr. Hansmeier's 10 motions were filed in defiance of Magistrate Judge Brisbois' instruction: "Absent an Order from this Court, the Court will not entertain from the parties any other motions or requests which are not specifically related to the issue of subject matter jurisdiction." Order, *Hansmeier v. MacLaughlin, et al.*, 20-cv-2155, Doc. 88 (filed July 9, 2021). Mr. Hansmeier did not request or receive permission from the Court, nor did he file a motion seeking leave to file, before filing these 10 motions.¹ (Mr. Hansmeier also appears to have violated Local Rule 7.1 by declining to

¹ It also warrants mention that as the undersigned awaited permission from the Court to file this letter, various other requests dated July 24, 2021—also made by Mr. Hansmeier without prior permission from the Court—were in the process of being filed. See, e.g., *Paul Hansmeier v. David MacLaughlin, Benjamin Langer, Anders Folk, and PFG II LLC*,

July 29, 2021
Page 3

contact the courtroom deputy prior to filing.) These 10 motions do not specifically raise the issue of subject-matter jurisdiction. The Federal Defendants thus understand them to not be properly before the Court and do not anticipate responding to them. If this understanding is not correct, the Court's guidance would be helpful in understanding whether the Court views these motions as properly before it despite Mr. Hansmeier's violation of Magistrate Judge Brisbois' Order; whether the Court wishes to receive responses by the Federal Defendants to these motions; and the deadlines for such responses.

Thank you for your attention to this matter.

Sincerely,

W. ANDERS FOLK
Acting United States Attorney

s/ Kristen E. Rau

KRISTEN E. RAU
Assistant U.S. Attorney
Attorney ID No. 0397907
600 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415
Kristen.Rau@usdoj.gov
(612) 759-3180

Cc:
Paul Hansmeier (via first-class mail)

Civil No. 21-CV-1543, Doc. 16 (JRT/LIB). Such requests are also in defiance of Magistrate Judge Brisbois' Order requiring advance permission for "any other motions or requests not specifically related to the issue of subject matter jurisdiction." Order, *Hansmeier v. MacLaughlin, et al.*, 20-cv-2155, Doc. 88 (filed July 9, 2021).